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September 18, 2007

Via Facsimile and Regular Mail

Facsimile No. (914) 390-4085

Hon. Charles L. Brieant  
United States District Judge  
Southern District of New York  
United States Courthouse  
300 Quarropas St., Room 275  
White Plains, New York 10601

**Re:     *Adrian Huff, et al., v. Mid Hudson Steel Corp.***  
***Civil Action No. 07 Civ. 5926 (CLB)(MDF)***  
***Our File No. 03-7418***

Dear Judge Brieant:

We represent Adrian Huff, *et al.* (Plaintiff), in the above referenced matter. Your Honor ordered a Court Conference in the above referenced matter for Friday, September 21, 2007 (Court Conference). I am writing to notify the Court of recent developments in the above referenced matter and to request an adjournment of thirty days.

On June 21, 2007, Plaintiff filed the Summons and Complaint in the above referenced matter. On July 5, 2007, the Summons and Complaint in the above referenced matter were served in accordance with Fed. R. Civ. P. Rule 5(b)(2)(A)(ii) by serving them on Jack Jacquin, Office Manager for Mid-Hudson Steel Corp. (Defendant), who indicated that he was an agent authorized by Defendant to receive service for Defendant. Defendant had until July 25, 2007 to file its Answer in the above referenced matter but failed to do so. To date, Defendant has not filed its Answer in the above referenced matter.

Hon. Charles L. Brieant  
United States District Judge

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September 18, 2007

On August 14, 2007, our firm received a telephone call from Donia F. Sawwan, Esq., of Fox Rothschild, LLP (FR) who indicated that FR represented Defendant. Ms. Sawwan requested an extension of thirty days to September 17, 2007, in which to file Defendant's Answer and otherwise respond to the Complaint. That day, we received a confirming letter by facsimile from Ms. Sawwan detailing the same.

On August 21, 2007, we received a telephone call from Keith R. McMurdy, Esq., of FR, who indicated that FR did not represent Defendant. Mr. McMurdy stated that FR represented Grammar, Dempsey & Hudson, Inc. (GDH), the parent corporation for Defendant, and could not file the Answer or otherwise appear for Defendant. Mr. McMurdy stated that Defendant is out of business and GDH is out of business and contemplating filing for bankruptcy.

On September 10, 2007, we notified Mr. McMurdy of the Court Conference. On September 11, 2007, we received a telephone call from Mr. McMurdy who stated that, because FR did not represent Defendant, FR could not appear at the Court Conference for Defendant. Mr. McMurdy stated that FR would receive service and file an Answer for GDH if the Complaint were amended to add GDH as an additional defendant. We are amending the Complaint to add GDH as a defendant and will promptly file the Amended Complaint with the Court upon completion.

We respectfully request that the Court Conference scheduled for this Friday, September 21, 2007, be adjourned for thirty days to allow Plaintiff to file an Amended Complaint with the Court, serve the Amended Complaint on FR, and allow GDH time to file its Answer to the Amended Complaint with the Court.

Thank you for your courtesies in this matter. If you have any questions, please do not hesitate to contact me.

Very truly yours,



William D. Frumkin (WF 2173)

WDF:WFC

cc: Adrian Huff, Fund Chairman (Via Facsimile)  
Sharon Molinelli, Fund Administrator (Via Facsimile)  
David Kramer (Via Hand Delivery)  
Keith R. McMurdy, Esq. (Via Facsimile)

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also admitted in New Jersey

September 18, 2007

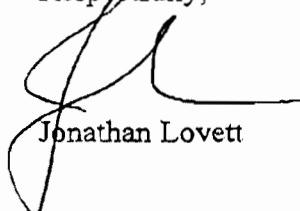
Hon. Charles L. Brieant  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, N.Y. 10601

Re: Huth v. Haslun, et. al, 07 Civ. 0152 (CLB)

Dear Judge Brieant:

Given scheduling difficulties, defense counsel and I are jointly requesting that the discovery cut-off in the above-referenced action be extended until November 23, 2007.

Respectfully,



Jonathan Lovett

JL:clp  
Cc: Seth Faber, Esq.

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**FACSIMILE TRANSMITTAL SHEET**

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TO:	FAX NUMBER:		
1) Hon. Charles L. Brieant	(914) 390-4085		
2) Keith R. McMurdy, Esq.	(212) 692-0940		
3) Adrian Huff, Fund Chairman	(845) 564-1769		
4) Sharon Molinelli, Fund Administrator	(845) 564-1769		
FROM:	DATE:	NO. OF PAGES: 3 (including cover sheet)	CLIENT/MATTER: <i>Adrian Huff, as Chairman of the Board of Trustees of Teamsters Local 445 Freight Division Pension Fund v. Mid-Hudson Steel Corp. Civil Docket No. 07 Civ. 5926 (CLB)(MDF) Our File No. 03-7418</i>
William D. Frumkin, Esq.	September 18, 2007	Time:	

**COMMENTS:**

ORIGINAL	WILL	<input checked="" type="checkbox"/>	FOLLOW	FIRST CLASS MAIL	<input checked="" type="checkbox"/>	TO JUDGE BRIEANT
WILL NOT		<input type="checkbox"/>	FOLLOW	OVERNIGHT SERVICE		<input type="checkbox"/>

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